

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b),) MM Docket No. 95-88
Table of Allotments)
FM Broadcast Stations) RM-8641
(Rose Hill and Trenton, North Carolina))

To: The Chief, Allocations Branch

DOCKET FILE COPY ORIGINAL

COMMENTS OF DUPLIN COUNTY BROADCASTERS

Duplin County Broadcasters ("Petitioner"), by its attorney, hereby respectfully submits its comments in response to the Commission's Notice of Proposed Rule Making in the captioned matter, DA 95-1277, released June 19, 1995 ("NPRM").

In support whereof, the following is respectfully shown:

1. The NPRM was issued in response to a petition for rule making filed by Petitioner. At paragraph 3 of the NPRM, the Commission requested additional information concerning the areas and populations which would lose existing service if the proposed allotment were made, together with the total reception service that is now available within both the gain and loss areas. Submitted herewith is a technical report and exhibits prepared by William J. Pennington, III, which provides that information^{*/} and demonstrates that the proposed reallocation and modification of the facilities of station WBSY(FM) to specify Trenton as its community of license would create a more efficient use of the

^{*/} A telecopy of Mr. Pennington's material is submitted herewith. The original copy will be tendered as a supplement upon receipt by this office.

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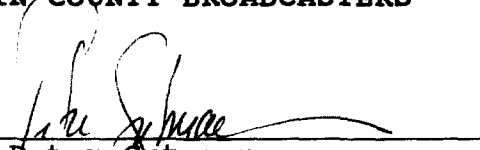
spectrum since both the community of Trenton and Jones County will obtain their first local broadcast outlet, there will be a significant gain in area and population served, and the entire loss area will remain well served.

2. It is further noted that the Commission has recently granted an application to assign the license of WBSY(FM) (together with co-owned AM station WEGG) (File Nos. BAL-950323GI and BALH-950323GH). Accordingly, Petitioner states that while it has a present intention to apply for the channel if it is allotted and, if authorized, to build a station promptly, it must be understood that this obligation may be assumed by an FCC-approved assignee of the WBSY license.

Respectfully submitted,

DUPLIN COUNTY BROADCASTERS

By


Peter Gutmann
Its Attorney

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August 10, 1995

TECHNICAL REPORT AND EXHIBITS
DUPLIN COUNTY BRODCSTERS
MM DOCKET NO. 95-88
WBSY(FM)
ROSE HILL, NORTH CAROLINA

PREPARED AUGUST 1995

CERTIFICATION

I, William J. Pennington, III do hereby certify;

That my qualifications in telecommunications matters are of record before the Federal Communications Commission having been presented and accepted on many occasions in the past;

That I am a consultant in technical topics pertaining to the broadcast industry and the associated RF transmission systems;

That I have been retained by Duplin County Broadcasters to perform certain technical studies and prepare this report of same;

That the accompanying technical report and exhibits were prepared by me personally or under my immediate personal supervision and that all information presented therein is true and correct of my knowledge and belief.

/S/


William J. Pennington, III

(Date)

8/8/95

INTRODUCTION

This statement was prepared on behalf of Duplin County Broadcasters, licensee of FM Broadcast Station WBSY(FM) at Rose Hill, North Carolina. It supplies technical information in support of comments in response to a Notice of Proposed Rule Making (RM-8641) in Docket No. 95-88.

DISCUSSION

Docket No. 95-88 proposes the substitution of Channel 284C2 for Channel 284A at Rose Hill, North Carolina, the reallocation of Channel 284C2 to Trenton, North Carolina, and the modification of Station WBSY(FM)'s license to specify Trenton as its community of license. Station WBSY(FM) presently operates with 2.80 kilowatts with an antenna height of 256 feet above the average terrain from an antenna height approximately two miles north northwest of Rose Hill.

As part of its Notice of Proposed Rule Making in this proceeding, the Commission sought additional information supporting the proposed changes in the Table of Allotments and modification of the present WBSY(FM) facilities. The attached material is responsive to that request and the supports the petitioner's proposed changes.

Exhibit E-1 shows the area which would lose service if the proposed channel substitution, allotment change and facility upgrade were effectuated. Specifically, only a small portion of the present WBSY(FM) service area would receive 60 dBu service from the station if operating with Class C2 facilities from an

antenna site just north of Trenton.

The proposed changes sought in this proceeding would create no white or gray area in the area where Station WBSY(FM)'s present 60 dBu service would be lost. In fact, the loss area, as shown in Exhibit E-2, receives 60 dBu service, in whole or part, from no less than sixteen existing FM stations. Table 1 is a list of those existing stations which make up the total reception service within the loss area.

The area which would receive new service from Station WBSY(FM) is shown in Exhibit E-3. Although no gray or white area would be eliminated by the institution of this service it would provide both the community of Trenton and Jones County, North Carolina with its first local broadcast outlet. The existing total reception service is shown in Exhibit E-4. Table 2 is a list of those existing stations which make up the total reception service within the gain area.

If the proposed changes are effectuated, a total of 32,114 persons will lose 60 dBu service from Station WBSY(FM). This loss is offset by the significant gain in population the station will serve if allowed operation with Class C2 facilities from Trenton.

In conclusion, the proposed substitution of Channel 284C2 for Channel 284A at Rose Hill, the reallocation of Channel 284C2 to Trenton and the modification of Station WBSY(FM)'s facilities to specify Trenton as its community of license would create a more efficient use of the spectrum, provide a significant gain in

service area and population served while not diminishing to any real extent the total reception service to the area that would lose 60 dBu service from WBSY(FM).

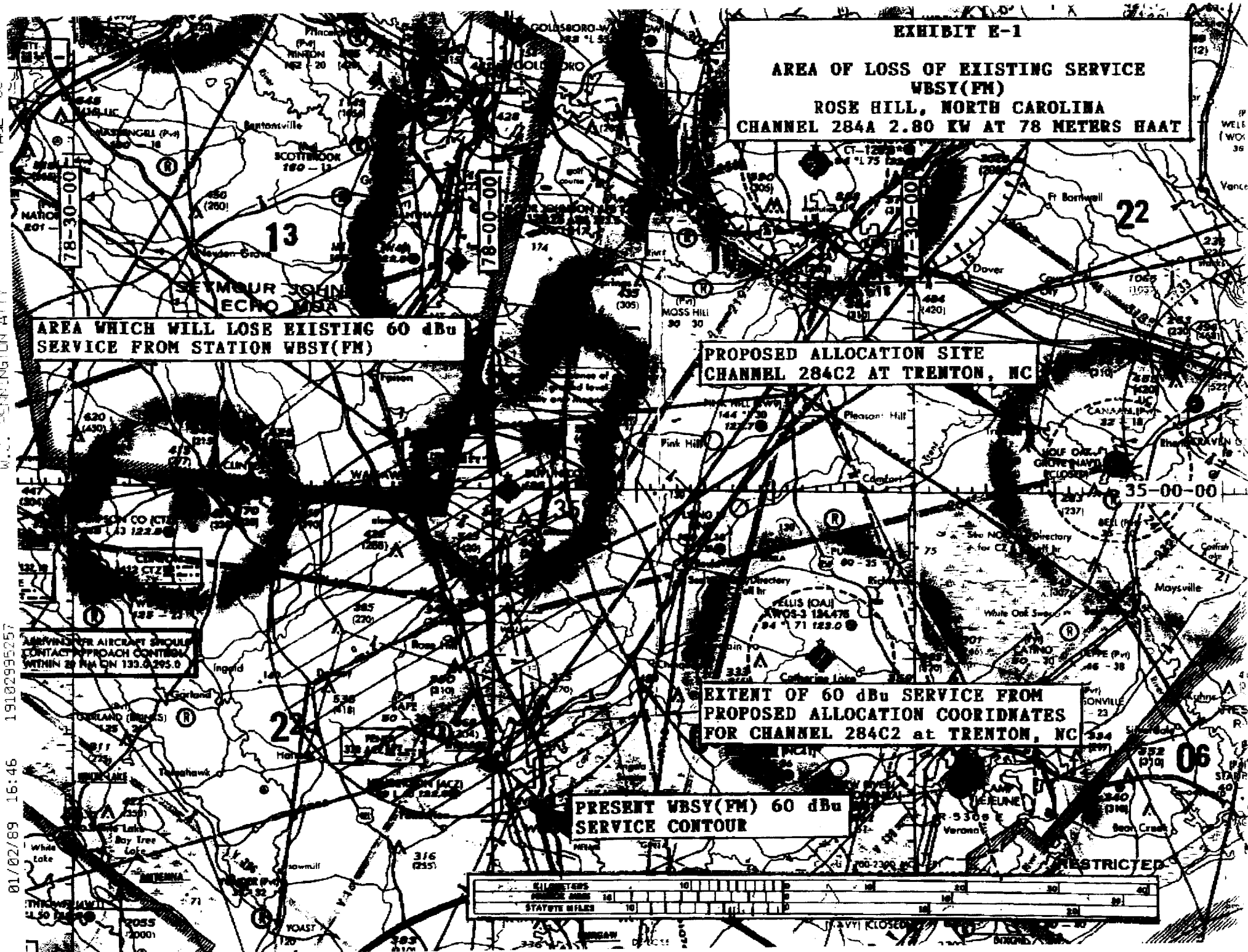
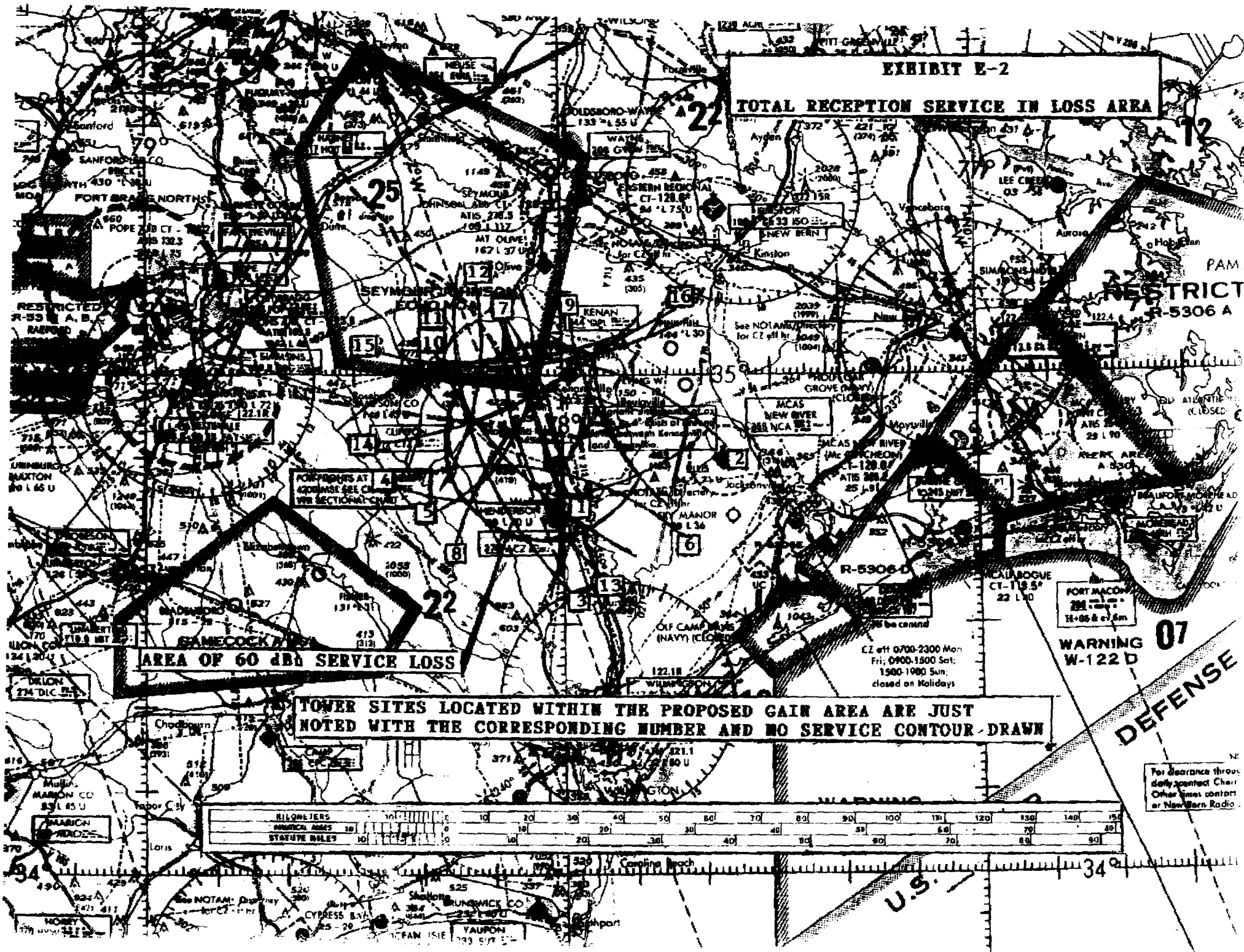


Table 1

RECEPTION SERVICES AVAILABLE WITHIN LOSS AREA

Call	Community of License	Frequency	Power	HAAT
1. WZKB	Wallace, NC	94.3	3.30	90
2. WKXB	Burgaw, NC	99.9	100.0	158
3. WRNS	Kinston, NC	95.1	100.0	457
4. WKTC	Goldsboro, NC	96.9	99.5	300
5. WMXS	Clinton, NC	107.3	13.0	138
6. WMNX	Wilmington, NC	97.3	100.0	171
7. WZFX	Whiteville, NC	99.1	100.0	299
8. WKOO	Jacksonville, NC	98.7	100.0	298
9. WIKS	New Bern, NC	101.9	100.0	300
10. WDLX	Washington, NC	93.3	100.0	543
11. WNCT	Greenville, NC	107.9	100.0	518
12. WQSM	Fayetteville, NC	98.1	100.0	253
13. WSFL	New Bern, NC	106.5	100.0	279
14. WRAL	Raleigh, NC	101.5	100.0	555
15. WTRG	Rocky Mount, NC	100.7	100.0	600
16. WRDU	Wilson, NC	106.1	100.0	411



35-30-00

AREA WHICH WILL GAIN 60 dBu SERVICE
FROM CHANNEL 284C2 AT TRENTON, NC

AREA TO GAIN NEW SERVICE

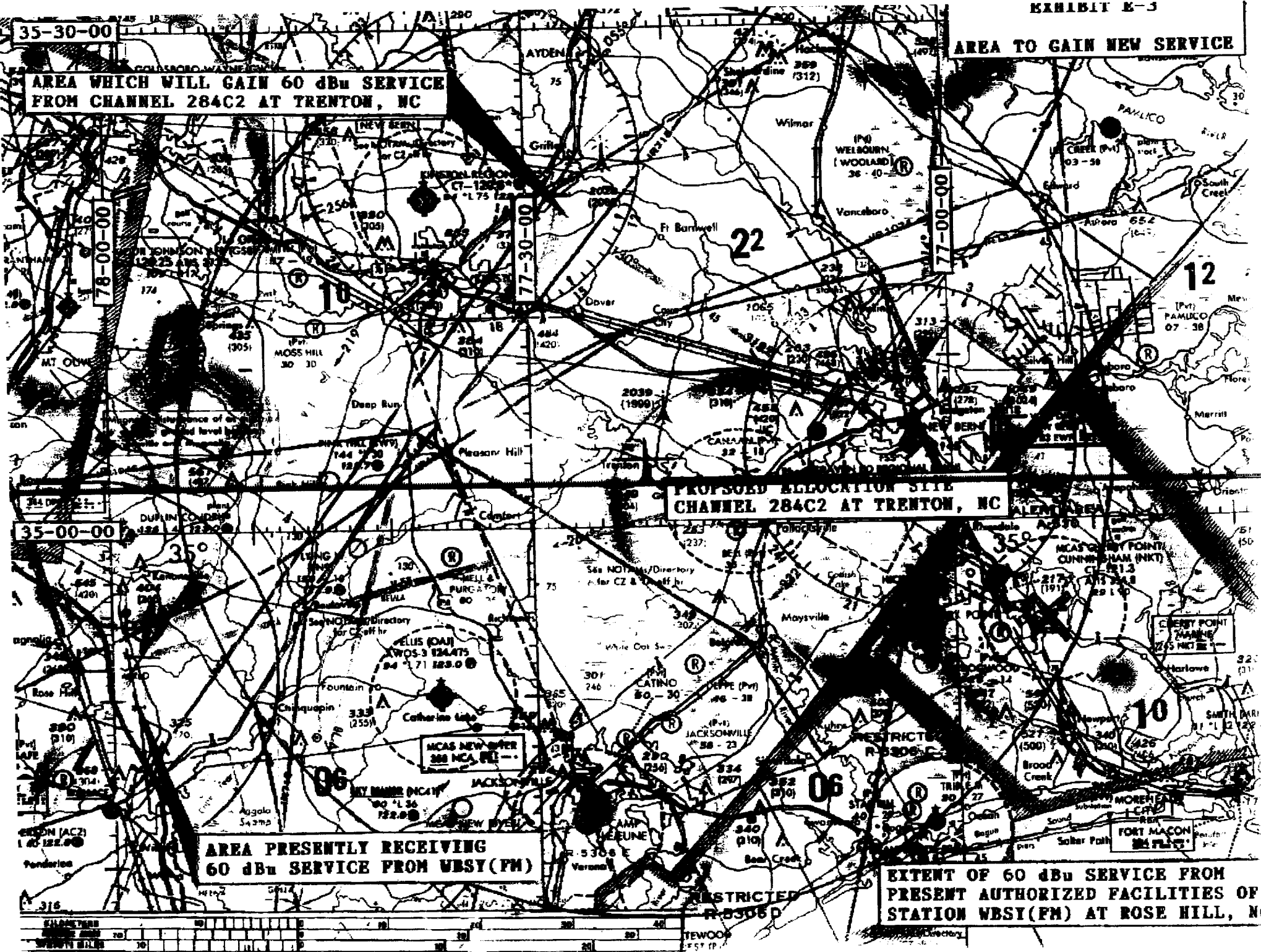


Table 2

RECEPTION SERVICES AVAILABLE WITHIN GAIN AREA

Call	Community of License	Frequency	Power	HAAT
1. WRNS	Kinston, NC	95.1	100.0	457
2. WKTC	Goldsboro, NC	96.9	99.5	300
3. WKOO	Jacksonville, NC	98.7	100.0	298
4. WIKS	New Bern, NC	101.9	100.0	300
5. WDLX	Washington, NC	93.3	100.0	543
6. WNCT-FM	Greenville, NC	107.9	100.0	518
7. WSFL	New Bern, NC	101.5	100.0	279
8. WFXK	Tarboro, NC	104.3	100.0	299
9. WZXS	Topsail Beach, NC	103.9	21.5	100
10. WNBR	Oriental, NC	94.1	11.0	148
11. WKQT	Newport, NC	103.3	100.0	181
12. WRHT	Morehead City, NC	96.3	100.0	150
13. WQDW	Kinston, NC	97.7	3.0	76
14. WKGK	Kinston, NC	102.9	3.0	90
15. WXQR	Jacksonville, NC	105.5	19.0	242
16. WFXZ	Jacksonville, NC	92.3	35.0	72
17. WMSQ	Havelock, NC	104.9	3.0	50
18. WTND	Grifton, NC	99.5	16.5	257
19. WKZF	Bayboro, NC	97.9	2.75	104
20. WHITE	Williamston, NC	103.7	100.0	299
21. WZKB	Wallace, NC	94.3	3.30	90
22. WRQR	Farmville, NC	94.3	1.95	124
23. WKJA	Belhaven, NC	101.1	31.0	187
24. WCZI	Washington, NC	98.3	2.5	152
25. WEQR	Goldsboro, NC	102.3	6.0	89
26. WRAL	Raleigh, NC	101.5	100.0	555
27. WKXB	Burgaw, NC	99.9	100.0	158
28. WTKF	Atlantic, NC	107.3	7.0	185
29. WTRG	Rocky Mount, NC	100.7	100.0	600
30. WRDU	Wilson, NC	106.1	100.0	411

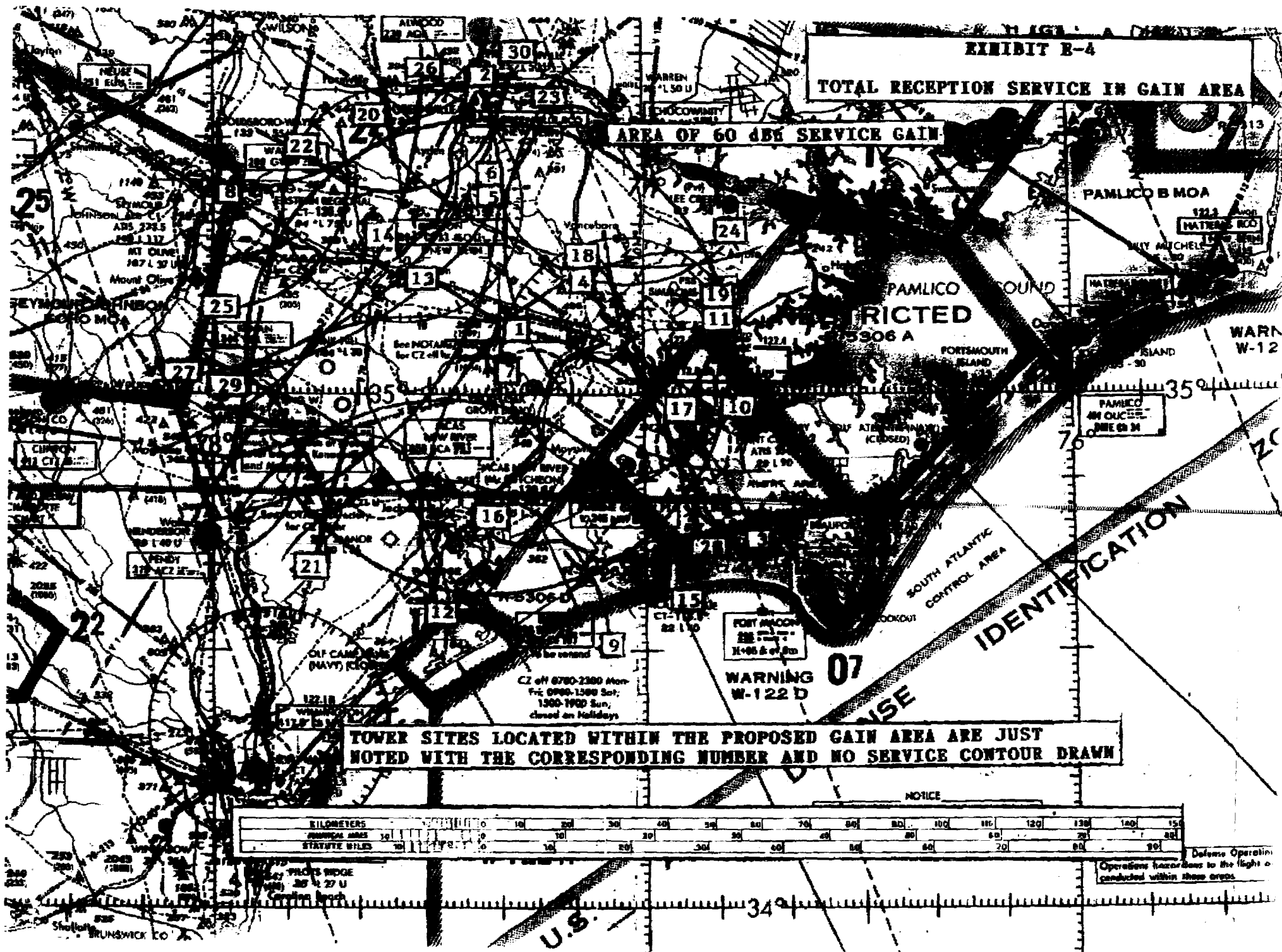


EXHIBIT E-4
TOTAL RECEPTION SERVICE IN GAIN AREA

AREA OF 60 DBE SERVICE GAIN

PAMLICO B MOA

RESTRICTED

5306 A

PORTSMOUTH ISLAND

WARN W-12

PAMLICO 4M OLC

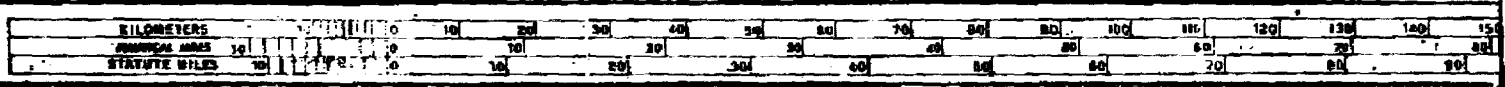
SOUTH ATLANTIC CONTROL AREA

IDENTIFICATION

WARNING W-122 D

07

TOWER SITES LOCATED WITHIN THE PROPOSED GAIN AREA ARE JUST NOTED WITH THE CORRESPONDING NUMBER AND NO SERVICE CONTOUR DRAWN



Defense Operations
Operations hazardous to the flight of
conducted within these areas